Richard E. Leff, Esq. (RL-2123) McGIVNEY & KLUGER, P.C. 80 Broad Street, 23<sup>rd</sup> Floor New York, New York 10004 (212) 509-3456

Attorneys for Defendants: AMERICAN EXPRESS COMPANY, AMERICAN EXPRESS BANK, LTD. and AMERICAN EXPRESS TRAVEL RELATED SERVICES COMPANY, INC.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

-----X 21 MC 102 (AKH)

LEONARD GAWIN (AND WIFE, MIROSLAWA GAWIN).

Index No.: 07-CV-01619

Plaintiff(s),

NOTICE OF ADOPTION OF ANSWER TO MASTER COMPLAINT

-against-

**ELECTRONICALLY FILED** 

2 GOLD L.L.C., SUCCESSOR BY MERGER TO CHICAGO 4, L.L.C., et al.,

Defendant(s). -----X

PLEASE TAKE NOTICE that Defendants, AMERICAN EXPRESS COMPANY, AMERICAN EXPRESS BANK, LTD and AMERICAN EXPRESS TRAVEL RELATED SERVICES COMPANY, INC., by their attorneys, McGIVNEY & KLUGER, P.C., as and for their Response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint filed in the above-referenced action, hereby adopt their Answer to Master Complaint dated July 31, 2007, which was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendants, AMERICAN EXPRESS COMPANY, AMERICAN EXPRESS BANK, LTD and AMERICAN EXPRESS TRAVEL RELATED SERVICES COMPANY, INC., demand judgment dismissing the above-captioned action as against them,

together with their costs and disbursements and for such other and further relief as this Court deems just and proper.

Dated: New York, New York August 30, 2007

Yours etc.,

McGIVNEY & KLUGER, P.C.
Attorneys for Defendants
AMERICAN EXPRESS COMPANY, AMERICAN
EXPRESS BANK, LTD and AMERICAN
EXPRESS TRAVEL RELATED SERVICES
COMPANY, INC.

Richard E. Leff (KL-2123) 80 Broad Street, 23<sup>rd</sup> Floor New York, New York 10004 (212) 509-3456

(212)/2005-343

TO: WORBY GRONER & NAPOLI BERN, LLP Plaintiffs Liaison
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All Defense Counsel